

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO,

As representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.

PROMESA

Title III

No. 17-BK-3283-LTS

(Jointly Administered)

This filing relates to the Commonwealth

**RESPONSE AND OPPOSITION OF CLAIM 10502
TO THREE HUNDRED SIXTY-THIRD
OMNIBUS OBJECTION (SUBSTANTIVE) REGARDING CLAIM NO. 10502**

COMES NOW the Claimant in Claim No. 10502, especially Luis P. Costas-Elena, represented by the undersigned and before this Honorable Court responds and opposes the Three Hundred Sixty-Third Omnibus Objection regarding Claim No. 10502.

1. The Creditor has a valid claim that is substantiated repeatedly in the proof of claim filed. The objection of Debtor Commonwealth of Puerto Rico is completely erroneous and falsely states that the proof of claim has not been substantiated or supported. Please note that Creditor mailed supporting documentation by certified mail to the Debtor via Prime Clerk on June 22, 2020.

The Debtor merely filed a self-serving boilerplate one-size-fits-all declaration, that does not constitute evidence. Mr. Jay Herriman is not even a lawyer authorized to practice in Puerto Rico. Consequently, Mr. Herriman cannot render a legal opinion on any matter related to Claim No. 10502, and his declaration does not constitute evidence in any Court.

2. Claimant of Claim No. 10502 opposes and contests any and all disallowance of the entirely valid and proper Claim No. 10502. Claimant demands trial by Jury of any action to disallow this claim.

3. The sought disallowance is contrary to law and fact. Creditor, claimant of Claim No. 10502 purchased various paper stamps to affix to legal documents, as required by Puerto Rico Law. The Commonwealth of Puerto Rico subsequently established a digital [on-line] protocol that required only electronic stamps to be used and made the prior paper stamps unusable. The Puerto Rico Treasury Department was supposed to reimburse all those persons holding paper stamps, but the Commonwealth of Puerto Rico entered Bankruptcy. The Creditor herein was left holding \$2,000.00 in paper stamps that have not been reimbursed by the Commonwealth of Puerto Rico. The Declaration of Mr. Jay Herriman shows ignorance of both Puerto Rican Law and its Procedures. Indeed, he does not even state what, if any, process he did to arrive at his unsupported, self-serving and conclusory opinion.

4. Claimant reserves the right to supplement, amend and amplify this opposition.

WHEREFORE, the Claimant respectfully requests that this Honorable Court approve and allow Claim No. 10502; reject any and all sought disallowance of Claim No. 10502; and/or provide Claimant a Trial by Jury.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 19th day of September, 2021.

I hereby CERTIFY that the instant Response and Opposition to Three Hundred Sixty-Third Omnibus Objection Regarding Claim No. 10502 was filed using the CM/ECF System of this Honorable Court which shall notify all Attorneys of record in this case.

/s/Luis P. Costas Elena

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